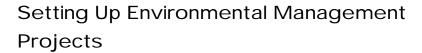# MODULE 7: IMPLEMENTING YOUR IEMS

You will ensure the success of your IEMS by developing the capabilities and support mechanisms to achieve your environmental policy, objectives, and targets. This module will cover planning for and setting up environmental management projects for each objective. In addition, this module covers tools that will help you keep your IEMS on track: a new product review process, a regulatory compliance tracking system, a pollution prevention tracking log, and an Emergency Preparedness and response plan development process.

Setting Up Environmental Management Projects

This section will help you set up environmental management projects developed to achieve each objective and target selected in previous modules.

The three main elements in developing an environmental management project are:

▸   identifying the person responsible for achieving the environmental objectives and targets in each relevant function and level;

▸   establishing the means or action plan for achieving targets and objectives; and

▸   implementing timetables.

An outline for such a program might include:

▶   objective,

▶   target,

▶   person(s) responsible,

▶   budget,

▶   date of expected completion,

▶   date of actual completion, and

▶   performance indicators for measurement.

Let's continue working with the two examples from Module 3:

▶   Recycle used toner cartridges.

▶   Reduce the environmental impact of chemical wastes from cleaning a printing press. Remember, the environmental aspect is the air releases during the press cleaning process and the water releases at the commercial laundry where the used press wipes were sent.

Figures 7-a and 7-b show example projects for the above two sample objectives and targets.

Figure 7-a. Sample Environmental Management Project Plan

Environmental Management Project Plan

SEA: Waste from Copy Toners

                                                Date_____

Environmental Objective: Reduce the waste from used copy toner cartridges

Performance Indicator Measurement: Number of cartridges purchased vs number mailed and number remaining in stock in one-year period.

Target: 100% recycling of used toner cartridges in conformance with manufacturer instructions.

Action Plan: Train persons in charge of replacing toner cartridges. Create a check list for dates cartridges mailed for recycling.

Responsibility: Office Manager

Budget: One hour training

Schedule: One month

Review: Monthly by company manager.

Corresponds to OTP-02 of the *Company Manual Template.*

Figure 7-b. Sample Environmental Management Project Plan

Environmental Management Project Plan

SEA: Chemical Wastes from Press Cleaning

Date_____

Environmental Objective: Reduce the Environmental Impact of Chemical Wastes from Press Cleaning

Performance Indicator Measurement: Amount of fluid reused; reduction in vapors measured at laundry provided by laundry.

Target 1: Reduce air releases of cleaning fluid by 80% in plant by end of 12-month period

Action Plan 1: Substitute Product B cleaning fluid, train printers in new product use

Responsibility: Printing Press Manager

Budget: Cost of new fluid

Schedule: Six months

Review: Monthly by company manager.

Action Plan 2: Substitute best work practice, train printers in best work practice

Responsibility: Printing Press Manager

Budget: Time for training and evaluation of results

Schedule: One year

Review: Monthly by company manager.

Performance Measurement: Amount of Product B substituted for current product in one-year period and reduction in total product used over one-year period.

Target 2: Reduce releases to the water at laundry by 40% after 12-month period.

Action Plan: Remove excess fluid from wipes prior to sending to laundry; reuse recovered fluid

Responsibility: Shop manager

Budget: Cost of centrifuge, time to process wipes

Schedule: 12 months

Review: Monthly by company manager.

Corresponds to OTP-02 of the *Company Manual Template*.

As you can see from Figure 7-b, more than one target can be used to accomplish an objective, and more than one action plan to accomplish a target. You need to outline the steps necessary to achieve each target and make sure that the responsibility for completion is assigned, the time frame specified, and a budget given to ensure completion. Appendix H contains a blank worksheet to assist you in planning your environmental projects.

Review New Products, Processes, and Activities

Change is an important part of business survival for most companies. Products, technologies, ways of doing things are updated regularly. To avoid creating new "significant environmental aspects" that must be addressed later, it is helpful to integrate new processes, products, and activities into the environmental management program that you are developing for the rest of your company. You can do so by setting up a procedure for reviewing new processes, products, or activities while they are in the planning stage. One way to accomplish this is to create a sign-off form to be circulated among the people responsible for or affected by the new process or product, including those responsible for the area of the company where the new process or activity will be implemented. Worksheet 7-1 is an example of such a sign-off form. The worksheet is a model that should be modified to reflect your company's activities and environmental policy.

Resource 📖

The results of your environmental projects plan can be documented on OTP-02 in the *Company Manual Template.*

☞ Tip

Conduct an Environmental Review when buying a new product, making a new product, changing an existing process, developing a new process, or undertaking new or changed activities.

Worksheet 7-1: Environmental Review of New Processes, Products and Activities				
Area of Company	**New Process, Product, or Activity**	**Environmental Review by**	**Environmental Effects**	**Pollution Prevention Opportunities**
	Manager/Date	Manager/Date		
Contact for form:		Date Completed:		

Compliance Tracking

If your company does not already have a method in place for tracking regulatory compliance activities, this IEMS Program provides the opportunity for developing one. A tracking system will help you integrate this aspect of environmental control into your IEMS Program, future planning, and your annual management review. Worksheet 7-2 provides an illustration.

☞ **Tip**

Investigate the legal requirements that may be associated with documenting your company's compliance before you design the worksheet that you will use. Worksheet 7-2 is an example of components that are useful, but regulations differ by locality. One source to review would be EPA's Small Business Compliance Policy.

Worksheet 7-2:* Compliance Tracking Log

Person Responsible	Regulation	Compliance Check Date	Results and Root Cause	Corrective Action/Date	Compliance Verified/ Date

Contact Person: Date Completed:

*Document results on CA-01 in the *Company Manual Template.*

Root cause analysis and the corrective action notices described above are useful in examining failures in compliance and ensuring that corrective action occurs.

Pollution Prevention: Ideas and Tracking

Pollution prevention is another environmental management tool that is important to integrate with your company's business activities. Pollution prevention means reducing or eliminating waste at the source. The focus is more on waste than on environmental risk. There is a hierarchy of solutions for pollution prevention:

1.   source reduction,
2.   reuse/recycle, and
3.   treatment.

Before deciding on major changes, an evaluation of alternatives, as described in Module 4, should be completed. There are, however, many different ways in which your company could successfully implement pollution prevention activities, especially if employees are encouraged to think about how to implement pollution prevention in their work practices.   Some examples would include reuse and recycle of office paper, turning off lights/equipment when not in use, and keeping the lid on solvent containers.

You may develop specific programs that incorporate pollution prevention, such as the toner cartridges example above, and you

may also want to encourage pollution prevention practices across the company. Measuring pollution prevention achievements is different from, and often more difficult than, measuring environmental achievements in general. Simply measuring the reduction in a waste stream might mean only that the waste has been transferred to another medium, not reduced. It is therefore important to measure the reduction at the source of waste generation. It may also be important to measure the activities that your company directs towards pollution prevention. The following are existing sources of information that your company may have that would help you track pollution prevention:

▸ Permit applications
▸ TRI reports
▸ Purchasing records
▸ Utility bills
▸ Hazardous waste manifests
▸ Material Safety Data Sheets

In addition, administrative procedures can be set in place that support pollution prevention activities. Below is a checklist to help you consider opportunities for your company:

▸ Establish procedures in each company area for identifying pollution prevention opportunities.
▸ Have a chemical or raw material inventory system in place.

▸ Assess how many objectives have been met through pollution prevention.

Worksheet 7-3 provides a tracking log for pollution prevention in your company.

Worksheet 7-3: Pollution Prevention Tracking Log					
Area of Company	Pollution Prevention Activity	Date Started	Results	Measurement Method	Person Responsible
Contact: Date Completed:					

Emergency Preparedness and Response

It is important to include environmental concerns in your emergency preparedness and response plans and training. The following steps will help you integrate plans for reducing the potential environmental impact of accidents, spills or other emergency situations.

- ▸ Appoint a person responsible for integrating environmental concerns. This can be the person already responsible for Emergency Preparedness and Response or someone from the IEMS team who will work with that person.
- ▸ Identify the potential environmental impacts of potential emergency scenarios.
- ▸ Develop response procedures to minimize these impacts and integrate them into the emergency preparedness and response plans.
- ▸ Conduct training for employees affected by these new procedures.

Worksheet 7-4 will help you identify your needs so that you can develop a plan.

Worksheet 7-4: Environmental Emergency Preparedness and Response

Potential Emergency Scenario	Potential Environmental Impact	Action Required	Procedures Needed	Training Needed